

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PA**

JACOB and JAMES JUNG as Administrators  
for the Estate of LOUIS JUNG, JR.

v.

CASE NO. 24-CV-05618

CITY OF PHILADELPHIA; YES CARE CORP.,  
BLANCHE CARNEY, LALITHA TRIVIKRAM,  
MAUREEN GAY, MARIESHA APOLLON,  
BLAIR CABELLOS, GENA FRASIER, and  
WANDA BLOODSAW

**ANSWER OF DEFENDANTS, YESCARE CORP., LALITHA TRIVIKRAM, MAUREEN  
GAY, AND BLAIR CABELLOS, TO THE CROSSCLAIMS  
OF THE CO-DEFENDANTS, CITY OF PHILADELPHIA,  
BLANCHE CARNEY, GENA FRAISER, AND WANADA BLOODSHAW**

**COME NOW**, the Answering Defendants, YesCare Corp., Lalitha Trivikram, MD, Maureen Gay, NP, and Blair Cabellos, LPN, by and through their counsel, O'Connor Kimball LLP, and as and for their Answer to the Co-Defendants' Crossclaims in the above-referenced matter state as follows:

1. Answering Defendants incorporate by reference its Answer to the Plaintiffs' Amended Complaint with Affirmative Defenses, with reference to all documents, referenced therein, as fully as if set forth herein at length.
2. Admitted.
3. Admitted.
- 4-6. Denied. The allegations contained in the corresponding paragraphs of Co-Defendants' Crossclaim contain conclusions of law which are deemed denied under the Pennsylvania Rules of Civil Procedure and no response is required. Strict proof thereof is demanded at the time of trial.

**WHEREFORE**, Answering Defendants, YesCare Corp., Lalitha Trivikram, MD, Maureen Gay, NP, and Blair Cabellos, LPN, demand that judgement be entered in their and against the Co-Defendants.

Respectfully submitted,

**O'CONNOR KIMBALL LLP**

By: 

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*Attorney for Defendants, YesCare Corp., Lalitha Trivikram, M.D., Maureen Gay, N.P., and Blair Cabellos, LPN*

Dated: 5/28/25

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PA

JACOB and JAMES JUNG as Administrators :  
for the Estate of LOUIS JUNG, JR. :  
v. : CASE NO. 24-CV-05618  
YES CARE CORP., LALITHA TRIVIKRAM, :  
MAUREEN GAY, and BLAIR CABELLOS, et al. :

**CERTIFICATE OF SERVICE**

I, Thomas J. Gregory, Esquire, hereby certify that I caused a true and correct copy of the foregoing Answer to Co-Defendants' Crossclaim to be electronically filed on this this 29<sup>th</sup> day of \_\_\_\_\_, 2025, and thereby served via the Court's Electronic ECF Filing System upon:

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